

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Continue
Implementation and Administration of California
Renewables Portfolio Standard Program

Rulemaking 11-05-005
(Filed May 5, 2011)

MOTION OF CALENERGY GENERATION FOR PARTY STATUS

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Attorneys for CalEnergy Generation

Dated: April 24, 2012

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Pursuant to Rules 1.4 and 11.1 of the Commission’s Rules of Practice and Procedure, CalEnergy Generation (“CalEnergy”) submits this motion to become a party in this proceeding.

CalEnergy is an international leader in the development and production of energy from diversified fuel sources including natural gas, hydroelectric and geothermal. CalEnergy has operations in the United States and the Philippines that generate more than 1,290 megawatts of electric power and steam. CalEnergy operates 10 geothermal generating plants in the Salton Sea Known Geothermal Resource Area in Southern California's Imperial Valley, which deliver RPS eligible energy to investor-owned and publicly-owned utilities.

CalEnergy is a subsidiary of MidAmerican Energy Holdings Company (“MEHC”). MEHC is a privately-held company that is incorporated in Iowa. Its primary business is the global production and delivery of energy via several subsidiaries. MEHC’s major energy subsidiaries include CalEnergy and:

- MidAmerican Energy Company - provides electric service to more than 729,000 customers and natural gas service to more than 709,000 customers in Iowa, Illinois, Nebraska and South Dakota.

- MidAmerican Renewables, LLC - includes MidAmerican Wind, LLC; MidAmerican Hydro, LLC; MidAmerican Geothermal, LLC; and MidAmerican Solar, LLC. These companies operate wind, geothermal and solar renewables projects.
- PacifiCorp - serves approximately 1.7 million customers, and operates as Pacific Power in Oregon, Washington and California; and as Rocky Mountain Power in Wyoming, Utah and Idaho. PacifiCorp's generating plants have a net owned capacity of 10,623 megawatts from thermal, hydroelectric, wind and geothermal resources.
- Northern Powergrid - is one of the largest distribution companies in the United Kingdom. It serves 3.8 million customers in an area covering about 10,000 square miles in northeastern England.
- Kern River Gas Transmission Company- brings natural gas into Utah, Nevada and California. Extending approximately 1,700 miles from the gas-producing fields in Wyoming to Bakersfield, Calif., Kern River delivers more than 1.9 billion cubic feet of natural gas per day to customers along the pipeline system.
- Northern Natural Gas Company - operates an interstate natural gas pipeline system extending from southern Texas to Michigan's Upper Peninsula. Northern provides transportation and storage services to 78 utilities and numerous end-use customers in the Upper Midwest.

On April 5, 2012, Commissioner Ferron issued an *Assigned Commissioner's Ruling Identifying Issues and Schedule of Review for 2012 Renewables Portfolio Standard Procurement Plans Pursuant to Public Utilities Code Sections 399.11 et seq. and Requesting Comments on New Proposals* ("ACR"). One of the major issues discussed in the ACR is the requirement for costly transmission network upgrades resulting from the large California Independent System Operator ("CAISO") interconnection queue volume and the requirement that RPS projects provide Resource Adequacy ("RA") capacity by obtaining full capacity deliverability status.¹ Costs associated with delivery network upgrades required to obtain full capacity deliverability status can be prohibitive, and make it difficult for viable renewable generation projects to obtain power purchase agreements and project financing. The ACR includes a proposal to address this problem.

The ACR requests comments from non-IOU and non-ESP parties on RPS procurement plans and the ACR's proposals in June. CalEnergy plans on providing comments

¹ ACR, pp. 24-29.

on the ACR's proposal to address the cost issues associated with renewable generation projects providing RA capacity by obtaining full capacity deliverability status. Accordingly, CalEnergy's participation in this proceeding will not prejudice any party nor will it expand the scope of this proceeding, as CalEnergy is focused on issues that are currently under consideration by the Commission in this docket. CalEnergy's participation will not cause any delay in the proceeding as CalEnergy will provide comments according to the schedule set forth in the ACR.

For the foregoing reasons, CalEnergy has a significant interest in the subject of this proceeding.

CalEnergy will participate in this proceeding through its representatives, whose information is as follows:

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and

Randy Keller
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Mr. Day will serve as the primary contact for CalEnergy for this proceeding. Mr. Keller will be on the "Information Only" Service List for this proceeding.

CalEnergy requests the Commission to grant its motion and allow it to participate as a party in this proceeding.

Respectfully submitted this 24th day of April, 2012 at San Francisco, California.

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By /s/ Michael B. Day

Michael B. Day

Attorneys for CalEnergy Generation

VERIFICATION

I am the attorney for CalEnergy Generation (“CalEnergy”) in this matter. CalEnergy is absent from the City and County of San Francisco, where my office is located, and under Rule 1.11(d) of the Commission’s Rules of Practice and Procedure, I am submitting this verification on behalf of CalEnergy for that reason. I have read the attached “Motion of CalEnergy Generation for Party Status,” dated April 24, 2012. I am informed and believe, and on that ground allege, that the matters stated in this document are true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 24th day of April, 2012, at San Francisco, California.

/s/ Michael B. Day

Michael B. Day